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January 13, 2021

VIA ECF

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, New Jersey 08101

Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION
Civil No. 19-2875 (RBK/JS)

Dear Judge Schneider:

Following the submission of the agenda letters yesterday, Plaintiffs and ZHP continued to meet and confer and that process is ongoing in an effort to reach agreement. In order to ensure that the Court has the most up to date status of the parties' positions, attached hereto is a copy of the email sent by Plaintiffs to ZHP's counsel last night incorporating the Plaintiffs' updated proposal (Ex. A hereto), and the updated calendar of ZHP depositions with the attached memoranda setting forth the 30(b)(6) topics assigned to each deponent for the Court's convenience (Ex. B hereto). Plaintiffs have received no response from ZHP at this time.

Honorable Joel Schneider, U.S.M.J.
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In connection with Hetero, those discussions have also continued, and attached is the most up to date proposal from Plaintiffs, sent to Hetero's counsel Tuesday evening. (Ex. C hereto). Plaintiffs are optimistic that agreement will be reached based upon the day's communications.

Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", written over a horizontal line.

Adam M. Slater